IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE SEARCHES OF:

Phone #1-Black Kyocera, Model S2150 Kona, "Flip Style" Cellular Phone Bearing Serial #5AAZG41KFN01 seized from Brandon Gibson, and Currently In Possession of the FBI, Pittsburgh Office.	))))	MAG NO. 15-631M
Phone #2-Red and Black HTC, Model H3000C, Touch Screen Cellular Phone Bearing Serial #SH358S700311 seized from Brandon Gibson, and Currently In Possession of the FBI, Pittsburgh Office.	))))	MAG NO. 15-632M

AFFIDAVIT IN SUPPORT OF APPLICATIONS FOR SEARCH WARRANTS

I, Leonard Piccini, Jr., Special Agent, Federal Bureau of Investigation, United States Department of Justice, being duly sworn, states as follows:

1. I am an "Investigative or Law Enforcement Officer of the United States" within the meaning of Title 18, United States Code, Section 2510(7); that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516

2. I am a Special Agent (SA) of the United States Department of Justice (DOJ), Federal Bureau of Investigation (FBI), and have been so employed since February, 2003. During that time, I have been assigned to investigative units dealing with drug trafficking, gangs, violent crimes and international terrorism. I have participated in numerous investigations of narcotics traffickers, violent gangs, and criminal organizations and their involvement in narcotics trafficking, firearms, and other related crimes.

3. I have participated in numerous controlled substance investigations and have debriefed or participated in numerous debriefings of defendants, informants and witnesses with personal knowledge regarding drug distribution organizations. I have participated in all aspects of drug investigations including T-III investigations, conducting surveillance, analyzing information obtained from court-ordered pen register and trap and trace intercepts, conducting controlled purchases of narcotics, reviewing and analyzing toll information obtained as a result of subpoenas issued by the FBI, and reviewing and analyzing records and other evidence seized during the execution of drug related search warrants.

4. I am currently participating in the investigation of Brandon GIBSON. I have probable cause to believe that on three occasions in August, 2013, GIBSON possessed with the intent to

distribute and distributed heroin in violation of Title 21 USC §§ 841 (a)(1) and (b)(1)(C). Based upon those controlled purchases of heroin from GIBSON outlined below, a Federal Grand Jury returned an indictment charging Gibson with those offenses. The Court issued a warrant for his arrest.

5. On June 10, 2015, agents of the Federal Bureau of Investigation, Pittsburgh Gang and Safe Street Task Force arrested GIBSON on the Federal arrest warrant at 1037 Lincoln Avenue, Duquesne, PA 15110. A search incident to arrest of GIBSON's person resulted in the seizure of two cellular phones. GIBSON has been released pending trial for violations of Title 21 USC 841 §§ (a)(1) and (b)(1)(C).

6. This Affidavit is made in support of an application which seeks authorization for search warrants for the two cellular telephones seized from Brandon GIBSON pursuant to his arrest on June 10, 2015. The below described controlled buys and circumstances of his arrest indicate that there is probable cause to believe that GIBSON was/is involved in illegal drug activities. Therefore, probable cause exists that further evidence of GIBSON's illegal activities will be found on these telephones found in his possession. The phones have been in custody of the FBI since the time of GIBSON's arrest.

7. I have obtained the information contained in this affidavit from my own participation in this case, as well as

information provided to me by other law enforcement Officers. Because this Affidavit has been drafted for the limited purpose of providing probable cause to search the two cellular telephones recovered from GIBSON at the time of his arrest, I have not included all the facts known to me about this investigation.

Overview

8. Through your Affiant's experience and training, your Affiant has become familiar with the methods of operation typically utilized by individuals who distribute illegal drugs. For example, drug traffickers routinely utilize cellular telephones to conduct their illegal business.

9. Your Affiant knows that it is common practice for drug traffickers to routinely utilize telephones, mobile phones, prepaid phones, calling cards, public telephones, text messaging, counter surveillance, false or fictitious identities, and coded communications to communicate with their customers, suppliers, couriers, and other conspirators for the purpose of insulating themselves from detection by law enforcement. Moreover, it is not unusual for them to initiate such mobile or prepaid phone service in the name of an associate or family member or in the name of a fictitious individual. These individuals often require the use of a telephone facility to negotiate times, places, schemes, and manners for importing,

possessing, concealing, and distributing controlled substances and for arranging the disposition of proceeds derived from the sale of controlled substances.

10. This Affidavit is made in support of an application which seeks authorization for search warrants of the following two cellular telephones which were seized from GIBSON incident to his lawful arrest, both of which are currently being held by the FBI at its Pittsburgh Field Office:

a. Black Kyocera, Model S2150, "Flip-Style" Cellular Phone Bearing Serial #5AAZG41KFN01

b. Red and Black HTC, Model H3000C, Touch Screen Cellular Phone Bearing Serial #SH358S700311

Facts Giving Rise to Probable Cause

Controlled Heroin Purchase I

11. During early August 2013, members of the Federal Bureau of Investigation Greater Pittsburgh Safe Street Task Force arranged for a CS to conduct a controlled purchase of heroin from GIBSON. While in the presence of agents, the CS initiated contact with GIBSON at 412-583-1481. GIBSON then contacted the CS telephonically. Agents overheard GIBSON and the CS arrange a meeting location for a 7 brick heroin transaction along with a price for the heroin.

12. The CS was provided an electronic transmitter and

official funds for the purchase. Agents conducted surveillance of the CS to the prearranged meeting location. While en-route, the CS could be overheard telephonically contacting GIBSON and informing GIBSON the CS is en-route to the meeting location.

13. Surveillance units observed GIBSON'S vehicle, black E350 Mercedes Benz bearing temporary license tag OH K729919 parked in the lot of his residence, 815 Duquesne Place Apartments, Duquesne, PA. After the CS advised GIBSON that the CS was en-route, surveillance units observed GIBSON enter the Mercedes and travel to the predetermined meeting location.

14. Surveillance units observed GIBSON exit the Mercedes and meet with the CS for a brief period. Ultimately, GIBSON returned to his vehicle and departed the area.

15. The CS returned to agents at a predetermined meeting location and agents recovered approximately 7 bricks of heroin which field tested positive for opium alkaloids.

Controlled Heroin Purchase II

16. In mid August of 2013, the CS was directed to contact GIBSON again for the purchase of heroin. The CS was provided an electronic transmitter and official funds for the purchase of approximately 5 bricks of heroin. Agents conducted surveillance of the CS to the prearranged meeting location.

17. The CS telephonically contacted GIBSON and GIBSON informed that he will be a few minutes late. After the CS

arrived at the predetermined meeting location, surveillance units observed GIBSON arrive in a black E350 Mercedes Benz bearing temporary license tag OH K729919.

18. Surveillance units observed GIBSON exit the Mercedes meet with the CS for a brief period. Ultimately, GIBSON returned to his vehicle and departed the area.

19. The CS returned to agents at a pre-determined meeting location and agents recovered approximately 5 bricks of heroin which field tested positive for opium alkaloids.

Controlled Heroin Purchase III

20. Near to the end of August of 2013, the CS was directed to contact GIBSON again at 412-583-1481 for the purchase of approximately 7 bricks of heroin. The CS was provided an electronic transmitter and official funds for the purchase of approximately 7 bricks of heroin.

21. While in the presence of agents, GIBSON telephonically contacted the CS and advised that GIBSON is ready. Shortly thereafter, surveillance units observed GIBSON exit 1037 Lincoln Avenue, Duquesne, PA and enter his black Mercedes sedan bearing temporary tag OH K729919. GIBSON then traveled to 815 Duquesne Place Drive, Duquesne, PA, exited his vehicle and then entered said building. Finally, surveillance observed GIBSON exit the building, re-enter his vehicle and travel to the predetermined meet location.

22. Ultimately, GIBSON exited his vehicle and briefly met with the CS before departing the meeting location.

23. The CS returned to agents at a pre-determined meeting location and agents recovered approximately 7 bricks of heroin which field tested positive for opium alkaloids.

Circumstances of Gibson's Arrest

24. When arrested pursuant to an arrest warrant GIBSON, who is unemployed and was driving a 2008 black E350 Mercedes Benz Sedan, registered to Vanessa Denise & Melvin George Brandon, 823 Oak Street, Duquesne, PA, was found in possession of the two cellular telephones listed above. Based on my training and experience, individuals who are involved in drug distribution often do not have employment, drive high end vehicles registered in other individuals' names and use multiple cellular telephone phones to conduct their illegal activities.

25. For the reasons set forth above, your affiant has probable cause to believe that GIBSON was/is involved in illegal drug activities. Based on my training and experience individuals involved in said illegal activities will utilize their cellular telephones i.e. Phone 1 and Phone 2 to store: photos, videos, text messages or similar messages such as SMS or IM, voice messages, calendar, telephone numbers (including the # of the phone itself), names, nicknames, indicia of ownership and/or use, and/or other contact or identification data of co-

conspirators, customers, and financial institutions, contained within the cellular telephone, call logs and/or call settings relating to the distribution of controlled substances. All of this data could be evidence of GIBSON'S illegal activities.

26. Thus, information contained within Phone 1 and 2 will most likely provide further evidence in regards to GIBSON'S illegal activities concerning violations of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(i) and 846, i.e., conspiring together with others to possess with the intent to distribute and distribute heroin.

Leonard Piccini Jr.
Special Agent
Federal Bureau of Investigation

Sworn to before me this
21st day of July 2015.

UNITED STATES MAGISTRATE JUDGE
Western District of Pennsylvania

ATTACHMENT A

1. The Devices to be searched are:

a. Black Kyocera, Model S2150 Kona, "Flip Style" Cellular Phone Bearing Serial #5AAZG41KFN01.("Phone 1")

b. Red and Black HTC, Model H3000C, Touch Screen Cellular Phone Bearing Serial #SH358S700311 ("Phone 2")

2. These Devices, which were seized from Brandon GIBSON incident to his arrest, are currently located at the Pittsburgh Office of the Federal Bureau of Investigation. This warrant authorizes the search and forensic examination of the Devices for the purpose of identifying the electronically stored information described in Attachment B.

ATTACHMENT B

1. All records and items on the Devices described in Attachment A, including:

   a. Text messages, recent call lists, voicemails and contacts lists;

   b. Pictures, files, videos, and programs;

   c. Lists and phone numbers of customers, co-conspirators and related identifying information;

   d. types, amounts, and prices of drugs trafficked as well as dates, places, and amounts of specific transactions;

   e. any information related to sources of drugs (including names, addresses, phone numbers, or any other identifying information);

   f. travel log records from the GPS and recent history;

   g. any information regarding drug proceeds.

2. As used above, the terms "records" and "information" include all of the foregoing items of evidence in whatever form and by whatever means they may have been created or stored, including any form of computer or electronic storage (such as flash memory or other media that can store data) and any photographic form.

3. All of the above items constitute evidence of violations of Title 21, United States Code, Sections 841(a)(i),

841(b)1)(B)(i), and 846 (distribution and/or possession with intent to distribute heroin, and/or conspiracy to distribute heroin).